

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

FTX RECOVERY TRUST,

Plaintiff,

-against-

MANIFOLD MARKETS, INC, MANIFOLD FOR
CHARITY, INC., ROSS RHEINGANS-YOO, and
FTX PHILANTHROPY, INC.,

Defendants.

Adv. Pro. No. 24-50214 (KBO)

CERTIFICATION OF COUNSEL

I, Matthew B. McGuire, counsel to Plaintiff FTX Recovery Trust, hereby certify as follows to the best of my knowledge, information and belief:

1. On November 8, 2024, Plaintiff FTX Recovery Trust¹ (the “Plaintiff”) commenced the above-captioned adversary proceeding by filing its *Complaint for Avoidance and Recovery of Transfers Pursuant to 11 U.S.C. §§ 105, 544, 548 and 550 and Del. Code. Ann. Tit. 6, §§ 1304 and 1305* [Adv. D.I. 1] (the “First Complaint”) against Defendant Manifold Markets, Inc. (“Manifold Markets”) in the United States Bankruptcy Court for the District of Delaware (the “Court”).

¹ Pursuant to the *Order Granting the FTX Recovery Trust’s Omnibus Motion to Substitute Plaintiffs in Adversary Proceedings* [D.I. 29554] and the *Notice of Substitution of Plaintiff* [Adv. D.I. 12], the FTX Recovery Trust is now the proper plaintiff and has been substituted in for debtors FTX Trading Ltd., Alameda Research Ltd., West Realm Shires, Inc., and West Realm Shires Services, Inc. that initially filed this action.

2. Defendant Manifold Markets’ deadline to answer, move, or otherwise respond to the First Complaint was extended multiple times, ultimately through August 12, 2025.

3. On July 23, 2025, Plaintiff filed a *Motion for Reconsideration or to Modify Order Allowing Rheingans-Yoo’s FDU Claim* [D.I. 31846] (the “Motion to Reconsider”);

4. On July 23, 2025, Plaintiff filed its *First Amended Complaint for Avoidance and Recovery of Transfers Pursuant to 11 U.S.C. §§ 105, 544, 548, and 550, and Del. Code. Ann. Tit. 6, §§ 1304 and 1305, and for Disallowance or Subordination of Claim Pursuant to 11 U.S.C. §§ 502 and 510* (the “Amended Complaint”) [Adv. D.I. 38] against Manifold Markets, Manifold for Charity, Inc. (“Manifold for Charity”), and Ross Rheingans-Yoo (collectively, the “Defendants” and together with the Plaintiff, the “Parties”), as well as FTX Philanthropy, Inc.

5. On July 25, 2025, a *Summons and Notice of Pretrial Conference in an Adversary Proceeding* (the “Summons”) was issued in connection with the Amended Complaint [Adv. D.I. 39].

6. On July 28, 2025, Plaintiff caused the Amended Complaint, Summons, and *Notice of Dispute Resolution Alternatives* to be served on Defendant Manifold for Charity [Adv. D.I. 39].

7. On August 5, 2025, Plaintiff and Defendants filed a *Stipulation of Time (A) For Defendants to Answer First Amended Complaint and (B) For Ross Rheingans-Yoo to Respond to Motion to Reconsider* [Adv. D.I. 40], pursuant to which counsel for Defendant Rheingans-Yoo agreed to accept service of the Amended Complaint on Rheingans-Yoo’s behalf, and extending Defendants’ time to respond to the Amended Complaint to September 15, 2025.

8. Plaintiff and Defendants have conferred and agree to a proposed stipulation to extend the time to respond to the Amended Complaint and the Motion Response Deadline to and including September 26, 2025, a copy of which is attached hereto as **Exhibit A**.

9. Accordingly, the Parties respectfully request that this Court enter the proposed stipulation at its earliest convenience.

Dated: September 12, 2025
Wilmington, Delaware

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/s/ Matthew B. McGuire

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